

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

<u>In the Matter of</u>	)	
Petition for Order Declaring	)	WC Docket No. 16-284
Warm Springs Telecommunications Company	)	
An Incumbent Local Exchange Carrier	)	
For the Warm Springs Reservation	)	
In Oregon	)	

**Comments by N-Com In Support of the Petition  
Of the Warm Springs Telecommunications Company**

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N-Com, Inc. is a telecommunications professional engineering company licensed in seven states, including Oregon, located in Lubbock, TX which has been providing a wide range of engineering planning and implementation services to rural telecommunications service providers since 2004. N-Com has had significant experience successfully assisting several Tribal owned telecommunications companies in planning and implementing startup service provider networks. N-Com was selected as the engineer of record for Warm Springs Telecommunications Company (WST) in 2010 to assist WST in utilizing American Recovery and Reinvestment Act (ARRA) funds to deploy voice and data services within the Confederated Tribes of Warm Springs Reservation. Consequently, N-Com is uniquely positioned to discuss the technology and quality of the voice and data network implemented by WST and the impact on WST's petition for ILEC status. Furthermore, N-Com was instrumental in assisting WST in their petition to the Oregon PUC for ETC status in explaining the technical aspects of their wireless capabilities in providing carrier class voice grade services, which was obtained.

In 2011, WST began deploying a fixed wireless access network on the reservation utilizing a 3.65 GHz license approved by the FCC to provide both voice and data service. WST also installed Fiber-to-the-Premise (FTTP) infrastructure to Tribal Administration buildings located in the community of Warm Springs. A fully redundant licensed 11 GHz microwave link was deployed to a site off of the reservation to gain access to an existing fiber optic network for the purpose of voice and data interconnects. Voice and data switching equipment were installed in a new 1,100 square foot state-of-the-art Central Office (CO) located on the reservation to terminate voice and data interconnections and provide service to local customers. WST's CO is equipped and operating to handle all of their voice and data service needs and is not dependent upon a third party or equipment located off of the reservation, with the exception of needing access to the Internet and Public Switched Telephone

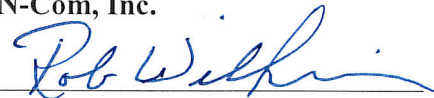
Network (PSTN). This CO is equipped with redundant air conditioning, a fire suppression system, a 26 kW DC power system, and backup power generator to support the softswitch, ISP, 10 Gigabit optical transport network, and FTTP access platform, all of which are owned and operated by WST. The softswitch deployed is a full featured Class 5 voice switch capable of providing standard voice features such as Caller ID and voicemail. The optical transport network supports not only traffic off the reservation, but provides transport for the wireless network and the FTTP access platform as it consolidates traffic through the core network and out to the outside world. Additionally, the FTTP access platform is capable of expanding to support all customers on the reservation. All equipment deployed to support the fixed wireless network and FTTP network was designed to provide a highly reliable level of service to end customers which includes a minimum of 8-hour battery backup at all sites in the event of commercial power loss. The wireless system provides carrier class voice services (equivalent to the standards set by the FCC for BETRS radio service, or better) and data services that met the ARRA broadband requirements.

Since the initial deployment of their network in 2011, WST has substantially replaced the existing ILEC as the primary voice and data service provider on the Reservation. However, WST realizes the continued need to grow and improve their network in order to provide even more reliable and higher speed data services across the Reservation. Consequently, WST intends to deploy additional FTTP service where economically feasible and upgrade fixed wireless equipment to take advantage of ongoing FCC efforts to add additional spectrum in the 3.65 GHz band. Obtaining ILEC status on the Reservation will enable WST to apply for funding from the USDA's Rural Utilities Service (RUS) Telecommunications Infrastructure Loan program and other initiatives such as SUTA, which would be utilized to continue to grow and improve their network as they seek to provide the highest level of service possible to the Reservation.

In summary, N-Com has designed and assisted WST with deploying a carrier grade voice and data network since 2011 which WST's competent management team and staff continue to build out, improve and operate. Consequently, N-Com would fully support and endorse WST in their petition to obtain ILEC status on the Confederated Tribes of Warm Springs Reservation. As the engineer of record for three other tribally owned telephone companies, all of which operate as the ILEC for their communities and reservations, we have witnessed the tremendous benefit to these communities in the success of these ILEC providers to bring affordable, high quality services to their tribal members, enterprises and tribal government by continually reinvesting into their networks and services.

Respectfully submitted,  
**N-Com, Inc.**

By:



Date:

Oct 20, 2016

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